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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

The Hon. James Donato

**DECLARATION OF AMANDA F.
LAWRENCE IN SUPPORT OF
ADVERTISER PLAINTIFFS' REQUEST
TO MODIFY SCHEDULE**

1 I, Amanda F. Lawrence, declare as follows:

2 1. I am an attorney admitted *pro hac vice* in this action (the “Action”). I am a partner at
3 Scott+Scott Attorneys at Law LLP, interim Co-Lead Counsel for the Advertiser Classes in the Action.
4 I submit this declaration in support of Advertiser Plaintiffs’ Request to Modify Schedule. The facts
5 set forth herein are within my personal knowledge and if called as a witness, I could and would
6 competently testify to them.

7 2. Counsel for Advertiser Plaintiffs have conferred with counsel for Defendant Meta
8 Platforms, Inc. (“Meta”), who opposes this motion, and asked that Advertisers include a short
9 statement in opposition within the motion, which Advertisers have done.

10 3. On Tuesday, November 28, 2023, Advertisers’ expert Dr. Michael Williams learned
11 that he would need to attend a two-week trial in another matter,

12 4. That trial is scheduled to run from January 8, 2024, through January 19, 2024.

13 5. Dr. Williams will also be required to dedicate significant time to trial preparation in
14 the week of January 1, 2024.

15 6. Dr. Williams informed me shortly after November 28, 2023, that while it may be
16 possible for him to attend the trial and finalize his merits report in this action by January 12, 2024,
17 doing so would be very challenging and burdensome for him and his team.

18 7. Advertiser Plaintiffs raised the limited, two-week extension proposed in Advertisers’
19 letter brief with Meta, and after meeting and conferring on the issue, the parties reached impasse on
20 December 14, 2023.

21 8. Pursuant to Local Rule 6.3(a), the only dates affected by Advertisers’ motion are the
22 three identified in Advertisers’ letter brief. Further, the operative scheduling order in this case, ECF
23 No. 379, amended a prior scheduling order, ECF No. 115, though ECF No. 115 did not include
24 deadlines for the specific events affected by Advertisers’ motion.

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1 I declare under penalty of perjury under the laws of the United States of America that the foregoing
2 is true and correct. Executed on this 18th day of December, 2023 at Colchester, Connecticut.

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4 /s/Amanda F. Lawrence
Amanda F. Lawrence
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CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2023, I caused a true and correct copy of the foregoing document to be served by electronic mail on all counsel of record.

Dated: December 18, 2023

By: /s/Amanda F. Lawrence
Amanda F. Lawrence